

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ABBOTT CARDIOVASCULAR)	
SYSTEMS, INC. and ABBOTT)	
LABORATORIES, INC.,)	
Plaintiffs,)	Civil Action No. 98-80 (SLR)
)	(Consolidated with C.A. No. 98-314 (SLR) and
v.)	C.A. No. 98-316 (SLR))
)	
)	REDACTED PUBLIC VERSION
MEDTRONIC VASCULAR, INC. and)	
MEDTRONIC USA, INC.)	
Defendants.)	
)	
)	

DECLARATION OF VICTOR W. ASSAD

I, Victor W. Assad, hereby declare as follows:

1. I am the Senior Human Resources Director of Medtronic Vascular, Inc's ("Medtronic Vascular") coronary and peripheral businesses, a position I have held since May 2007. Prior to that time, in addition to serving as Senior Human Resources Director, I also led Medtronic Vascular's Talent Acquisition and Compensation teams based in Santa Rosa, California. I have personal knowledge of the matters stated herein and, if called upon, I could and would testify competently thereto.
2. As Senior Human Resources Director, my job responsibilities include monitoring all employment transactions in Medtronic Vascular's coronary and peripheral businesses, such as hires, transfers, and terminations, and ensuring that those transactions are accurately reflected in Medtronic Vascular's employment records.

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as

of October 2007, Medtronic Vascular had 1,202 employees located in Santa Rosa.

3. Another one of my responsibilities as Senior Human Resources Director is to monitor employment trends in Sonoma County, California (where Santa Rosa is located). Based on my years of observing employment trends in the area, I know that Medtronic Vascular has long been one of the five largest private employers in Sonoma County. According to recent data from the Sonoma County Economic Development Board, which I routinely rely on in performing my job responsibilities, Medtronic Vascular is the fifth largest employer (and fourth largest private employer) in Sonoma County. A true and correct copy of excerpted pages from the Sonoma County Economic Development Board's Economic and Development Profile for 2006 is attached hereto as Exhibit A. A complete copy of this document is available on the Economic Development Board's website at <http://www.sonoma-county.org/edb/reports.htm>.

4.

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Bare-metal stents are

the coronary and peripheral division's primary product line on the United States market.

5.

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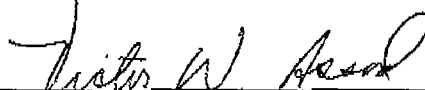
6. Abbott Cardiovascular Systems, Inc. ("ACS") is located in Santa Clara, California, which is more than 100 miles south of Medtronic Vascular's offices in Santa Rosa.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 23, 2007, at Santa Rosa, California.



Victor W. Assad

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on November 8, 2007 I electronically filed the foregoing with the Clerk of the Court using CM/ECF which will send notification of such filing to Frederick L. Cottrell, III.

I further certify that on November 8, 2007 I served copies of the foregoing to the following counsel in the manner indicated:

BY HAND & EMAIL

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